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EX PARTE OR LATE FILED

October 29, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

RE: Ex Parte Meeting
CC DKT. 97-208 Application by BellSouth Telecommunications, Inc. and
BellSouth Long Distance, Inc. for Provisioning of In-Region, InterLata
Service in South Carolina.

Dear Mr. Caton:

On Tuesday October 28, 1997, Kenneth P. McNeely, Stephen C. Garavito, Jay M. Bradbury, C. Michael Pfau, Karen Weis and I of AT&T and Mark Haddad of Sidley & Austin met with Michael Pryor, Jordan Goldstein, Melissa Newman, Jeannie Su, Rob Tanner, Daniel Shiman, Melissa Waksman, Michelle Carey, and Florence Setzer of the Common Carrier Bureau's Policy and Program Planning Division. The purpose of this meeting was to discuss specific issues raised in AT&T's Comments in the above referenced proceeding related to the unavailability of unbundled network elements in South Carolina, the inaccessibility to and discriminatory nature of the operational support systems that BellSouth has in place for new entrants to order, provision and maintain resold services and unbundled elements, and the lack of performance measurement procedures and data available from BellSouth for South Carolina.

Attached are the two documents used during the presentation:

1. A brief outline of the presentation submitted during the meeting of AT&T; and

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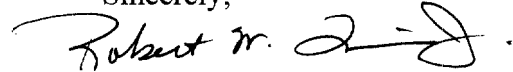


2. A document which consists of Attachments 5, 17, 19a, and 21 to the Affidavit of Jay M. Bradbury on behalf of AT&T Corp. previously made a part of the record in this proceeding.

Additionally, as requested by the Common Carrier Bureau, Policy and Program Planning Division Staff, I have also provided the prefiled testimony of William J. Carroll before the Arbitration Panel convened by the South Carolina Public Service Commission, Docket No. 96-358-C, Order No. 97-712, as well as Volumes III and IV of the hearing transcripts from that proceeding.

Two copies of this Notice are being submitted on the following business day to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert M. [unclear]". The signature is fluid and cursive, with a large initial "R" and a stylized ending.

Attachments

cc: J. Goldstein
M. Newman
R. Tanner
M. Pryor
D. Shiman
J. Su
M. Waksman
M. Carey
F. Setzer

Overview of LENS Pre-Order Functionality

Inquiry Mode Functionality Consists of Five Independent Transactions Without Memory Between the Transactions.

Because There is no Memory Between the Transactions, three of the Transactions, Telephone Number Selection, Services and Features Available, and View Installation Calendar Require the Performance of an Address Validation as part of Their Operation.

1. Customer Service Record (CSR)
2. Address Validation (AV)
3. Telephone Number Selection (AV + TNS) (Restricted by the 100 Number / 5% Rule)
4. Services and Features Available (AV + S&F) (Information on Complex Services is Not Provided)
5. View Installation Calendar (AV + VIC) (No Intervals for UNEs, Complex Services, or Central Office Only Orders) (Due Date is an Estimate)

The Transactions can be Performed in Any Sequence.

Firm Order Mode Functionality Consists of Six Linked and Dependent Transactions With Memory Between Them.

The Transactions Must be Performed in the Required Sequence As If Preparing An Actual Order.

Therefore this Mode Can Only Be Used For The Types of Orders and Services Supported by LENS, Not for the Full Range of Order Types and Services a CLP Can Actually Order for Its Customers.

1. Customer Service Record (CSR)
2. Address Validation (AV)
3. Telephone Number Selection (TNS) (Not Restricted by the 100 Number / 5% Rule) (Reservations Only "stick" if a LENS Order is Placed.)
4. Services and Features Available (S&F) (Only Services Which Can Be Ordered Through LENS Are Shown)
5. Local Service Request (LSR) (This Transaction is Required to Place a LENS Order But Has Nothing To Do With the Pre-Order Process - The Requirements of Approximately a Dozen Screens Must be Satisfied)
6. Due Date Calculation (DD) (Works Only For the Types of Orders and Services Which Can Be Ordered in LENS)

Neither Mode Standing on Its Own, Nor the Combined Use of the Modes Provides a CLP With the Pre-Ordering Functionality Available to BellSouth in Either RNS or DOE.

Restrictions on Telephone Number Reservation and Selection Being Imposed on CLPs by BellSouth

System Used	DOE	RNS	Interim Manual & Electronic	LENS Firm Order Mode (2)	LENS Inquiry Mode
Rules Applied					
Marked During Transaction	X	X		X	
Marked For 24 Hours					X
Selected for 7 Days	X	X		X	
Reserved for 9 Days					X
Reserved for 90 Days			X		
100 Number / 5% Limit on CLP Reservations (3)			X		X (1)

- (1) Includes both numbers viewed (and therefore Marked for 24 Hours) and reserved in a given central office.
- (2) Numbers can only be selected by the submission of a valid LENS order. Canceling an order before it is submitted returns the number(s) to the available pool.
- (3) 5% Limitation is a violation of the AT&T Interconnection Agreement.

Sources: LENS Users Guide. ATLAS/Harmonize Users Guide. Meetings/letters with/from ATLAS Administrators and Account Team.

BellSouth / Competitive Local Provider Service Order Edits are Discriminatory

BellSouth has not Provided Business Rules, Edit Information or Codes Which are Necessary for CLPs to be able to Pre-Edit Their Own Orders

System Used and User	DOE BellSouth	RNS BellSouth	EDI - Mainframe CLP	EDI - Personal Computer CLP	LENS CLP	EXACT CLP
Edits Applied by BellSouth						
On-Line						
FUEL		X				
SOLAR		X				
SOER	X					
After Order Submission						
SOER		X	X	X	X	X
LEO			X	X	X	
LESOG			X	X	X	
CLP Pre-Edit			X (1)			

(1) A CLP can build a pre-editor to match BellSouth only if BellSouth provides the business rules, edit information and codes being used in the systems handling the CLP's orders. BellSouth has not made this information available.

FUEL = FID and USOC Edit Library

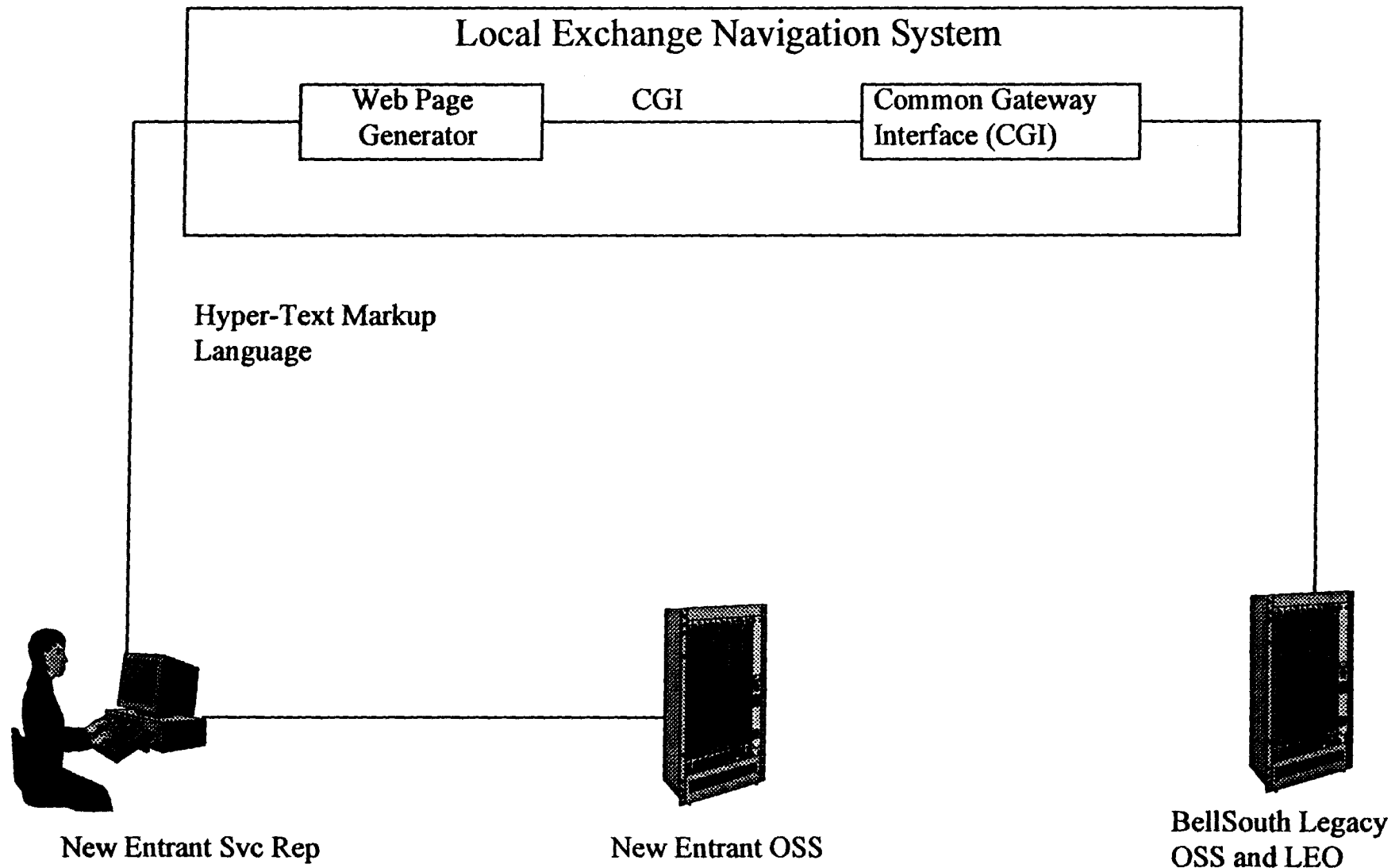
SOLAR = Service Order Layout and Analysis Routine

SOER = Service Order Edit Routine

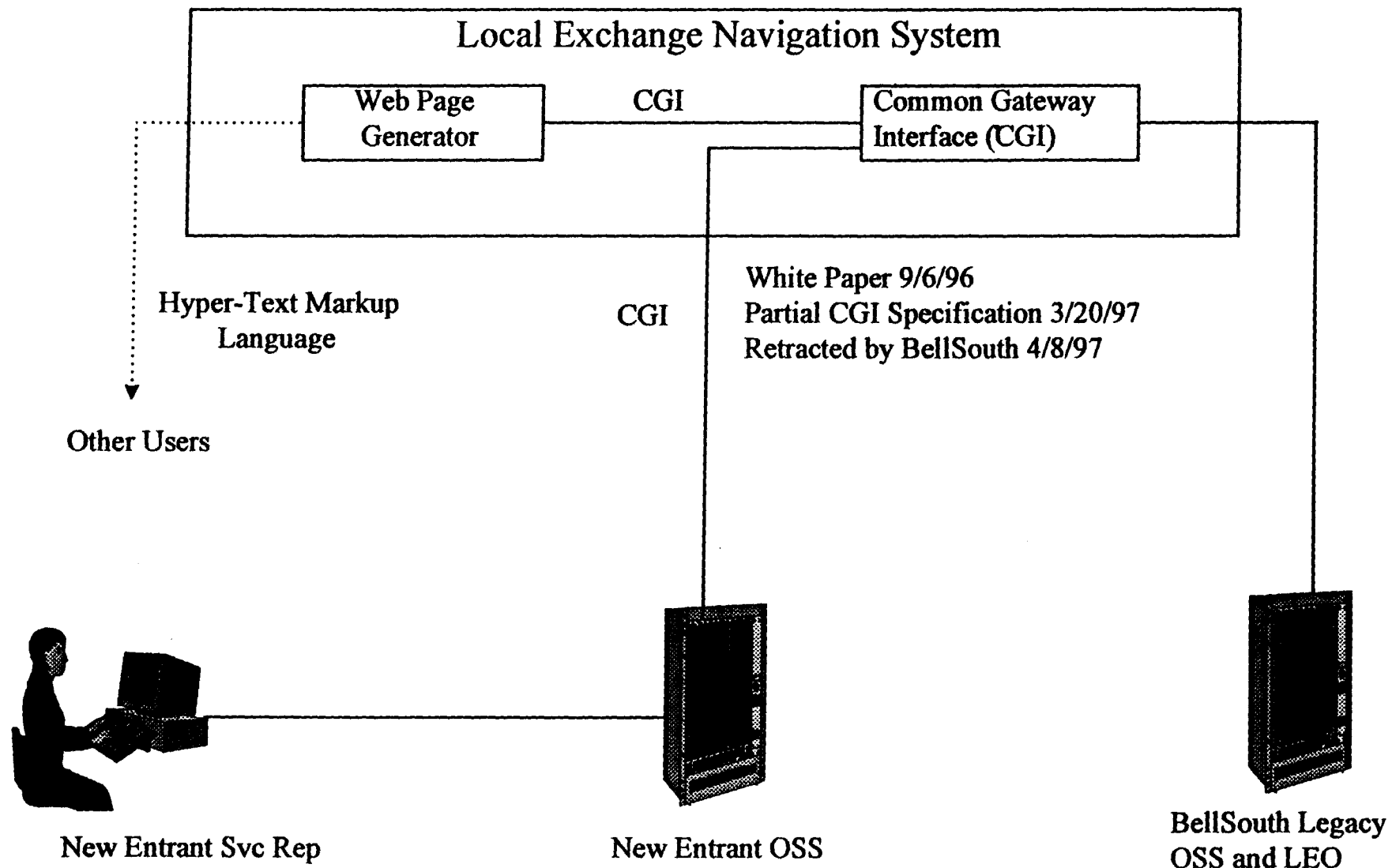
LEO = Local Exchange Ordering

LESOG = Local Exchange Service Order Generator

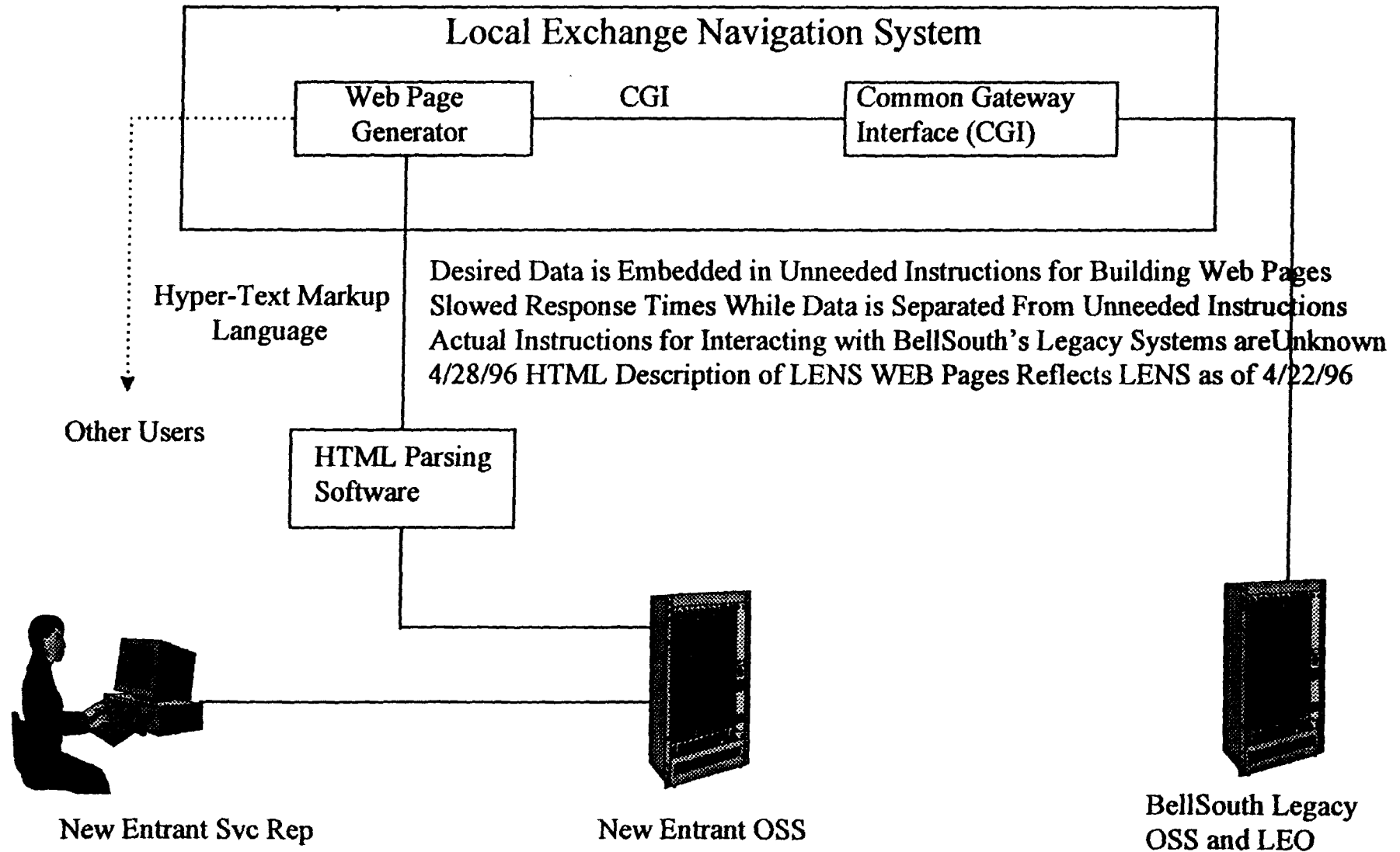
BellSouth's LENS is a Human to Machine Interface



BellSouth's LENS is a Human to Machine Interface
CGI Can Be An Effective Method to Allow Machine to Machine Operation



BellSouth's LENS is a Human to Machine Interface
HTML is not Usable for a Machine to Machine Interface



BellSouth South Carolina
271 Application - CC Docket 97-208

October 28, 1997

AT&T Meeting
with the
Federal Communications Commission

BellSouth OSS Interfaces

- None of BellSouth's region-wide interfaces provides nondiscriminatory, parity access to BellSouth's Operation Support Systems (OSS).
- BellSouth is implementing interfaces intended to support resale, but has barely begun to implement the necessary interfaces with respect to unbundled network elements.
- BellSouth has not begun the OSS development needed to accommodate combinations of UNEs because it was "pursuing its legal disagreement with the FCC position." Stacy Aff. (OSS) Par. 60.

BellSouth's OSS Interfaces

- Pre-Ordering
 - LENS is a proprietary interface that cannot be integrated with the EDI ordering interface or a CLEC's OSS. LENS lacks functionality that BellSouth enjoys.
 - BellSouth has not provided the specifications necessary for a CLEC to integrate LENS.
- Ordering
 - The current EDI version does not permit ordering of all resale services or UNEs. Critical information, such as rejection and jeopardy notices, is returned via fax. Most orders are processed manually.

BellSouth's OSS Interfaces

- Maintenance and Repair
 - TAFI is not integrated with a CLEC's own OSS.
 - Current T1M1 (EBI) lacks functionality.
- Billing
 - BellSouth has not yet produced CABS billing for resale services.
 - BellSouth has not provided usage sensitive billing for UNEs.
 - BellSouth has not developed a method for providing access and terminating usage information to CLECs using unbundled local switching.

OSS Interfaces - Pre-Ordering

- LENS is a proprietary interface which BellSouth changes constantly and which does not permit a CLEC's OSS to connect with BellSouth's OSS.
- LENS does not provide data in a format compatible with the industry standard EDI interface for ordering, which must be used by CLECs providing high volumes of orders. CLECs must manually re-enter information from LENS into EDI, which results in delays while the customer is on the line, increased errors in orders, and increased costs to CLECs.
- DeltaCom has experienced significant down time with LENS. Moses Aff., Par. 8, Att. C to ALTS Opposition.

OSS Interfaces - Pre-Ordering (cont.)

- LENS does not provide CLECs with the same capabilities that BellSouth customer representatives have:
 - No ability to reserve a firm due date while the customer is on the line.
 - No ability to determine immediately the contents and status of a pending customer order.
 - No ability to import data from the Customer Service Record.
 - No unrestricted ability to reserve a telephone number.

OSS Interfaces - Ordering

- EDI is the industry standard for ordering and must be used by competitors that will place high volumes of orders.
- The current EDI interface provides only limited ordering capability.
- The EDI interface required by the AT&T-BellSouth interconnection agreement will not be in place until December 31, 1997, at the earliest. EDI 7.0 will not be available until late February, 1998.
- Most EDI orders are processed manually.
- BellSouth has not provided business rules, edit information or codes, which are necessary for an EDI user to pre-edit their orders.

OSS Interfaces - Inability to Integrate Pre-Ordering and Ordering

- In September 1996, BellSouth stated in a “White Paper” that it could provide a data stream and “tag values” from its LENS server.
- From September 1996 to January 1997, AT&T repeatedly requested without success the specifications necessary to implement this method.
- On January 23, 1997, BellSouth and AT&T met. BellSouth stated that all of its resources were dedicated to implementing LENS by March 31, 1997, but it could implement tag value method by May 1, 1997. AT&T renewed its request for specifications.

OSS Interfaces - Inability to Integrate Pre-Ordering and Ordering (cont.)

- On March 20, 1997, BellSouth provided partial technical specifications to implement the tag value method.
- On April 8, 1997, BellSouth advised AT&T that the tag value specifications were not technically feasible.
- Both AT&T and BellSouth estimated that -- if LENS were stable -- it would take 2 -3 months to develop and implement a CGI solution.
- On April 15, 1997, BellSouth advised the Georgia PSC that “because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS interface is finalized.”

OSS Interfaces - Inability to Integrate Pre-Ordering and Ordering (cont.)

- BellSouth discontinued work on its CGI specification in April 1997 and “ha[s]n’t made an effort to keep it updated.” Calhoun Testimony (Ky. PSC, 8/26/97), Att. 12 to Bradbury Aff.
- LENS has been changing on almost a weekly basis since becoming available on April 28, 1997. Stacy Fla. Depo., Att. 13 to Bradbury Aff.
- DeltaCom has requested a white paper on CGI, but has not received any information from BellSouth. Moses Aff., Par. 9, Att. C to ALTS Opposition.

OSS Interfaces - Maintenance and Repair

- BellSouth's Trouble Analysis Facilities Interface (TAFI) shares the same deficiencies as LENS -- it is a proprietary interface that requires manual re-entry by CLECs.
- BellSouth's T1M1 interface allows the CLEC's OSS to connect to BellSouth's OSS, but there currently is no functionality on the BellSouth side. The trouble ticket is printed out and handled manually.

OSS Interfaces - Billing

- BellSouth admits (Milner Aff. Par. 107) that until recently it was unable to bill CLEC-specific wholesale discounts. This contradicts its March 1997 end-to-end test findings that individual resale services could be billed with the proper discount.
- BellSouth also admits that until recently discounts were not applied appropriately to nonrecurring charges associated with resale. *Id.*
- BellSouth has provided AT&T test billing data, which AT&T is analyzing to determine if BellSouth has met its contractual commitment to provide CABS-formatted billing (due by August 2, 1997). Test files do not balance.
- BellSouth has not developed a method for providing access and terminating usage information to CLECs using unbundled local switching.

OSS Interfaces - Lack of Performance Data

- BellSouth has not adequately tested the access it is providing to its OSSs.
 - Despite repeated requests, it has not shared performance data regarding such access, i.e., the percentage of electronic “flow through”. Data produced in Florida indicates that most CLEC orders are handled manually.
 - Despite repeated requests, it has not provided data that compares actual installation intervals for BellSouth orders vs. CLEC orders.
 - It has not demonstrated that its interfaces can handle CLEC volumes -- experience indicates they cannot. As AT&T has increased its use of BellSouth’s OSS interfaces, critical BellSouth OSSs have crashed.

Performance Measurements

- BellSouth has failed to provide necessary parity performance and comparative results.
- Performance measurements submitted by BellSouth lack clarity and supporting material can mislead the reader.
- BellSouth's approach to comparison is inadequate.
- Despite the preceding shortcoming, the data submitted by BellSouth fails to show nondiscriminatory performance.

BellSouth Has Failed to Provide Performance Measurements Previously Found “Useful”

- Average installation intervals
- Comparative data for UNEs
- Service order and provisioning intervals
- Held orders
- Timeliness of firm order confirmations
- Timeliness of order rejections
- Timeliness of order completion notification
- Bill timeliness, quality and accuracy
- Other omitted performance measures

BellSouth Steadfastly Refuses to Consider Other Equally Useful Measurements

- Ordering and Provisioning
 - Jeopardy Interval
 - % Jeopardies
- UNE
 - Availability
 - Performance
- Other
 - Support Center Speed of Answer & Call Abandonment
 - OS & DA Speed of Answer
 - Network Performance

BellSouth Measurements Are Inadequately Defined and Support Material May Mislead

- Measurements vaguely defined plus data elements and business rules are not addressed.
- Measurements are unilaterally changed.
- Areas with potentially misleading information:
 - no agreement on use of SPC
 - definition in WNS-8 not identical to Attachment 12
 - many measures listed but not reported
 - service delivery interval is really “offered” interval